incumbent LEC and the long distance carrier record usage at their switches. In the local exchange resale market, however, only the incumbent LEC records usage at its switch. The identification of the CLEC's usage is determined further downstream and transmitted to the CLEC through a daily usage file. Therefore, the sharing and comparison of usage records between the incumbent LEC and CLEC is not technically feasible as only one party, the incumbent LEC, records usage. The comparison of two independently generated sets of usage records is the central premise to FOS. No comparable process exists in the local exchange market.

6. The Commenters' Proposed Hypothetical Retail Analogs Are Meaningless.

GST proposes (p. 11) that "the Commission should require ILECs that do not provide themselves with the kinds of notice discussed in paragraph 59 to assume that they give such notice to themselves as soon as it would be practicable for them to do so." Similarly, ALTS states (p. 12) that "concerning any incumbent that does not issue a nominal 'Firm Order Commitment' ("FOC") to itself, it should be required to report the timing of its 'virtual FOC.'" Ameritech is surprised that carriers would propose such an approach. In an attempt to force a retail equivalent where none exists, these carriers seek to have Ameritech pretend to perform a process that it does not perform, and then speculate as to its duration. This would result in a measure that is arbitrary, inherently prone to conjecture, and thus meaningless.

Along the same lines, several CLECs propose that the Commission manufacture "virtual" retail analogs for unbundled network elements, by pretending that certain retail services are

analogous to such elements.[12/] As state arbitration decisions have confirmed, there are significant operational differences and additional tasks involved when Ameritech provides a network element on an unbundled basis, as compared to using the same underlying element as one component of an integrated retail service. In re AT&T Communications of Illinois, Inc.: Petition for Arbitration, Nos. 96 AB-003 & 004, at 38 (Ill. Commerce Comm'n, Nov. 26, 1996) ("[C]omparing the provisioning of unbundled elements to retail services is inapt. The FCC recognized engineering distinctions in ¶ 421 of the First Report and Order . . . . Accordingly, AT&T's proposal to measure unbundled element parity by resale transaction time frames should be rejected."); In re MCI Telecommunications Corp.: Petition for Arbitration, No. 96-AB-006, at 62 (Ill. Commerce Comm'n, Dec. 17, 1996) ("The record establishes that MCI's claims regarding provisioning benchmarks mix apples and oranges. For example, intervals for interconnection trunks and for unbundled interoffice transmission facilities cannot properly be compared."). Retail services are not merely a collection of unbundled network elements that can be ripped apart and measured separately.

Ameritech recommends, as it did in its Comments, that the Commission instead allow the use of "win-back" orders for comparison. Unlike the hypothetical analogs described above, the win-back process actually exists. Second, win-backs use the same systems as those for CLEC resale orders and, therefore, can help identify differences caused by discriminatory treatment. Win-backs provide common sense retail analogs for order status measures.

12/ ALTS, p. 22; Allegiance, pp. 10-11; AT&T, pp. 34-35; MCI, pp. 22-23; TCG, p. 3.

C. The Proposed Microscopic Levels Of Geographic And Product Disaggregation Are Unnecessary And Unworkable.

Ameritech strongly supports the rigorous application of cost-benefit principles to proposed performance measures as suggested in the Notice (¶ 36). Ameritech adheres to these principles by recommending state-level reporting, which best corresponds to Ameritech's interconnection agreements with competing carriers, and the jurisdiction of state regulatory commissions. And within each performance measure, Ameritech employs the same two-part test for assessing levels of disaggregation: The addition of a reporting level must add meaning to the measure and pass a cost-effectiveness test. Ameritech's recommended levels of disaggregation and geographic reporting implement the Commission's attempt "to balance our goal of detecting possible instances of discrimination with our goal of minimizing, to the extent possible, burdens imposed on incumbent LECs." NPRM ¶ 46.

Various CLECs, however, have suggested far more detailed levels of disaggregation and geographic reporting. It is evident that these commenters did not take an objective approach when deriving their wish list, and instead abandoned their professed support for the Commission's cost-benefit test. Their proposals would be unduly burdensome, expensive to implement and result in no additional utility.

For example, implementing the levels of disaggregation and geographic reporting suggested by AT&T alone would require Ameritech to report approximately 10.2 *million* monthly measurements. Each new CLEC entrant would add more than 164,000 measures per month to this already-immense total. But AT&T does not stop there: It requests that the measures be disclosed through separate "CLEC Aggregate Summary," "CLEC Aggregate

Exception Detail," "Individual CLEC Full Detail," "ILEC Full Detail," and regulatory reports. The volume of report pages and numbers suggested by AT&T's plan shows a total disregard for the type of balance that the Commission is seeking.

AT&T's proposal is long on cost but short on evidentiary support. AT&T offers only one quantitative example in support of its exhaustive disaggregation scheme. That rationale is based on anecdotal commentary, none of which has any statistical merit and does not merit adoption or even serious consideration.

Referring to Attachment B of its comments, AT&T states that with "only a handful of exceptions, each of AT&T's recommended measurements has been publicly supported by at least one (and usually many) RBOCs, thus eliminating serious claim of infeasibility or burden." Putting aside the fact that the source for some of this misinformation dates back to last year, and the fact that there is 47 percent disagreement even on the generic measurements presented, AT&T's claim is deceptive. The overall measurements themselves represent only a small portion of their recommended reporting requirements. Significant disagreement exists when one considers calculation methodology, levels of disaggregation and geographic reporting. For example, AT&T suggests that there is universal agreement among the BOCs with regard to Average Completion Interval. However, when applying AT&T's levels of product, activity and volume disaggregation using MSA-level reporting, the measurement would entail 21,600 different measures for each CLEC per month. Needless to say, there is <u>not</u> widespread agreement to report all 21,600 measures.

Perhaps the most egregious examples of needless disaggregation are the many requests for added data that are supported by nothing more than fanciful tales of potential discrimination -- discrimination that would require elaborate schemes, thousands of participating conspirators, and wholesale modifications of existing systems. For instance, some commenters suggest that an incumbent LEC would intentionally provide better-than-average performance in one geographic area in order to cover up discriminatory performance in another. Not one commenter presents even one shred of evidence that any such scheme has been attempted or is even feasible. Nor is there any showing that the measurements already proposed by the Commission and supported by a consensus are in any way insufficient to detect and remedy such activity, even if it were plausible.

Other commenters ask for additional levels of disaggregation by simply assuming that there is a substantive difference in performance between their proposed categories, without presenting any evidence that there are differences in the underlying processes used by incumbent LECs that would drive a difference in performance. For example, Network Access Solutions ("NAS") suggests (p. 3) that the Commission require incumbent LECs to measure separately the time required to determine loop availability for the provision of xDSL access service and the time it takes to determine loop availability for other services. NAS reasons, without support, that it takes longer to determine loop availability for xDSL service than for other services. NAS is, however, mistaken. Ameritech (and most other incumbent LECs) have mechanized provisioning systems that automatically use built-in tables to define the hierarchy of loop assignments based on the requested service type. The systems can determine whether a facility is available to meet

the requirements of a particular service (such as xDSL service, to use NAS' example). This process is mechanized and the determination for "xDSL" (HDSL and ADSL compatible in Ameritech) loop availability is no different than for any other services, takes no longer, and does not require separate presentation. The mere fact that one carrier uses a particular product extensively does not mean that every incumbent LEC must separately report performance at that level for all carriers.

Ameritech recognizes that market forces, customer preferences, products and CLEC operations can affect performance. Ameritech's proposed levels of disaggregation and geographic reporting effectively balance this possibility against the cost of providing data at a more detailed level. Where this level of disaggregation reveals the need for more detailed analysis, Ameritech's proposal has the flexibility to allow for such analysis, tailored to the specific situation at hand. But attempting to anticipate and report, on a monthly basis, every possible factor that might conceivably affect performance is infeasible. As stated in Ameritech's Comments (p. 88), the initial cost for developing a data warehouse, just at the level of disaggregation and geographic reporting described in the Notice, would exceed $8 million. The operating challenges that would result from reporting and interpreting more than 10 million measurements per month would be astronomical.

IV. REPORTING PROCEDURES

Several CLECs lobby for the right to conduct audits of the incumbent LECs' performance measurements without any showing of need. (AT&T p. 66; MCI p. 31; LCI p. 11.) It must be remembered that the incumbent LECs do not deal with only one or two CLECs, but

rather have interconnection agreements with an ever-growing number of them. Ameritech alone has over 150 interconnection and resale agreements region-wide. Thus, although there may be some superficial appeal to individual audit rights, when taken in the aggregate they are unreasonable, highly disruptive to incumbent LEC operations, and prohibitively expensive.

Because of their disruptive effect and cost, Ameritech's Comments propose (p. 86) that audits be limited to cases where there is reasonable basis to believe that the data provided by an incumbent LEC is flawed, and that the incumbent has failed to correct the data after those flaws are brought to its attention. SBC agrees (p. 23) and notes that its interconnection agreements establish a similar procedure.

Ameritech thus strongly disagrees with AT&T's proposal (p. 66) that "[e]ach CLEC should have the right to conduct an audit at least once a year, without cause." (Emphasis added.) The deterrent effect of potential audits, where apparent discrepancies in data warrant them, is sufficient to render peremptory audits unnecessary. AT&T's proposal for no-cause audits is unnecessary and unduly burdensome, and should be rejected.

Audits, even well crafted and articulated, are expensive and intrude on the normal operations of a business. For example, an audit requested by the Public Utility Commission of Ohio ("PUCO"), and which is not yet concluded, has already resulted in expenses of $815,000, including costs for analysis, management and legal fees, development cost of extended systems for data access, storage for an historical database, and computer usage.

The time and expense required to accommodate separate audits from many CLECs would be staggering. There are currently 60 CLECs operating in Ameritech's five-state region.

AT&T's proposal would allow each and every one to initiate one audit annually, without cause, for a cumulative total of sixty audits per state or 300 audits across the Ameritech region. Given the $800,000 spent to date on the one Ohio audit discussed above, the total cost of AT&T's proposal across the Ameritech region alone could run into hundreds of millions of dollars per year. Moreover, new entrants would further compound the number of audits that could be required on an annual basis. This proposal just does not stand the Commission's cost-benefit test, and should be rejected.

V. EVALUATION OF PERFORMANCE MEASUREMENTS

A. Introduction

The purpose of this section is to address selected comments and proposals regarding statistical issues. The comments provided here are in addition to the broader discussion of statistical issues provided in Ameritech's Comments. As described below, Ameritech agrees with AT&T's proposal that the overall statistical test across all measures should be constructed to ensure that there is only a five percent chance of identifying non-parity when parity actually exists. Ameritech does not agree, however, that the LCUG's *modified* z-test is an acceptable statistical measure. As Sprint has noted (p. 6), the modified z-test "does not test for differences in variances and ... has been modified from generally accepted statistical procedures."

Most importantly, Ameritech does not concur with the self-executing and pre-established enforcement mechanisms described by MCI. The complexity of providing interconnection, unbundled network elements, and resold telecommunications services, and the vast potential for the appearance of disparity even when parity exists, make such a cookbook approach

unadvisable. Instead, Ameritech maintains, as it did in its Comments, that if the first phase of statistical analysis indicates an apparent potential disparity, further investigation must be performed to determine its cause.

B. Response To AT&T's Comments

Attachment G of AT&T's Comments provides additions and revisions to AT&T's *ex parte* communication addressing the issue of statistical testing. Ameritech agrees with most of the additions that AT&T has made. In particular, Ameritech notes that AT&T has addressed three of the main concerns raised in Ameritech's Comments.

1. A General Parity Test Should Have No More Than Five Percent Chance of Type I Error.

In its original proposal, AT&T suggested that if more than 5 percent of the measures failed a "parity test" based on a 95 percent confidence interval, there would be statistical evidence of disparity. AT&T now agrees with Ameritech that the general parity test should produce only a five percent chance of finding disparity when parity exists. See AT&T Comments, Attachment G, p. 21. As AT&T states (id.) "the Type I error rate of the overall procedure is exactly 5 %." Ameritech supports AT&T's view (Attach. G, p. 19) that the structure of the overall parity test should be based on two dimensions: "(a) the number of tests that fail in any monthly period must not be too large, (b) the number of tests that fail for three consecutive months must not be too large."

2. Random Chance May Produce Measures With Three Consecutive Months of Disparity.

AT&T now acknowledges that random chance will produce three consecutive months of so-called "parity test failures" even when there is underlying parity. Nevertheless, AT&T maintains that "non-compliance is indicated if any series fails the test in three successive months..." See AT&T Comments, Attachment G, Exhibit 1, p. 27. This statement is inconsistent with the general statistical framework AT&T presents in the body of their Attachment G. As stated in Ameritech's Comments, and as AT&T itself agrees, some measures will fail the "parity test" in three consecutive months simply by random chance. Ameritech agrees with AT&T's recognition, in the body of Attachment G, of the pitfalls of relying on consecutive months of "parity test failures," but disagrees with the apparently contradictory statement in Exhibit 1 to AT&T's Attachment G.

3. Random Chance Will Produce More Than .25 Percent Of Measures That Fail Parity in Two Or More Months.

As mentioned above, AT&T advocates general performance measures that will fail to indicate parity only 5 percent of the time when parity actually exists. As part of this general framework, AT&T has properly omitted its earlier proposal that no more than .25 percent of measures should fail parity in two consecutive months. Ameritech agrees with AT&T's new proposal, which omits this specific .25 percent criteria.

Ameritech agrees with these three adjustments that AT&T has made to its previous proposal on statistical testing, and it now appears that there is close agreement between Ameritech and AT&T on the general statistical framework that should be used for the first phase

of statistical analysis, which establishes a "Safe Harbor." Ameritech reiterates its position, however, that if this first phase statistical analysis does not qualify the incumbent for Safe Harbor treatment, additional investigation and statistical analyses must be performed. Ameritech's support for statistical testing is premised on the assumption that a more detailed investigation would be performed if first-phase statistical testing indicated a potential disparity in performance. Ameritech reiterates that it does not support statistical testing for the purpose of imposing automatic sanctions.

4. The Proposed "Modified Z-Test" Is Invalid.

Ameritech does not agree with the modified z-test that AT&T and the LCUG espouse. As Sprint itself points out (p. 6), this modified z-test is not a standard statistical measure. The properties of this measure have not been addressed in standard statistical texts nor investigated in statistical journals. Most importantly, it is not proven that this modified z-statistic is unbiased, consistent or minimizes error, the qualities that statistical authorities generally recognize as desirable.[13/] Ameritech advocates the use of a standard test statistic, such as the standard z-statistic, t-statistic, or f-statistic, which have been used widely and are generally accepted in the statistics literature. The statistical properties of these standard statistical measures have been investigated extensively and are well known. Before considering the use of a novel test statistic, such as the modified z-statistic, extensive testing and research would need to be performed to determine its statistical properties. Absent such additional research, it is not possible to evaluate the validity, if any, of modified z-statistic. Ameritech therefore maintains that if variances are to

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13/ See, e.g., A.M. Mood, Graybill and Boes, Introduction to the Theory of Statistics, Third Edition (McGraw-Hill, New York) Chapter 7.

be investigated as part of the first phase of statistical tests, standard, proven, statistical tests, such as the standard z-test, t-test, or f-test, should be employed.

C. Ameritech Agrees With SBC That Overall Performance Should Be Considered

Ameritech agrees with SBC's comment (p. 30) that the analysis of performance measurements should balance observations of over-performance by incumbent LECs against observations of under-performance. SBC's point has particular relevance if the parity tests under discussion were used for punitive purposes. However, as Ameritech has already stated in its Comments, the statistical tests proposed by AT&T are only useful as a first phase analysis. If a potential lack of parity is indicated on this first phase analysis, additional tests (potentially including an analysis of countervailing over-performance) would have to be considered to determine if discrimination by the incumbent LEC is the underlying cause before any punitive action was taken.

D. MCI's Proposal for Automatic Sanctions Should Be Rejected

Ameritech does not agree with MCI's comment (p. 24) that "self-executing and pre-established enforcement mechanisms and penalties are necessary to motivate LECs to provide an adequate level of service, and are the only effective way to deter anti-competitive behavior without additional delays from uncertain enforcement efforts." As Ameritech has stated previously, the complexity of the industry makes it functionally impossible to pre-specify all or even most of the possible determinants of observed service quality.

For example, Ameritech recently noticed a high volume of "repeat troubles" for CLEC customers. Further investigation revealed that these repeats were not attributable to any

deficiency in Ameritech's maintenance activities, but occurred because both the CLEC and the CLEC's customers were calling Ameritech about the same individual troubles. This duplicative trouble reporting erroneously inflated the reported rate of repeat troubles for the CLECs. Without further investigation, this explanation would not have been discovered.

MCI suggests that punitive action should be taken without investigation of the reasons underlying an initial observation of apparent disparity. In this evolving industry, MCI's proposal to mete out punishment through self-executing mechanisms will lead to arbitrary, virtually random punishment even in situations where performance is in parity. This system violates fundamental principles of fairness and due process and must be rejected.

VI. CONCLUSION

For the reasons described herein, and in its Comments, Ameritech respectfully requests that the Commission not issue rules, model or otherwise, for performance measurement, because it lacks authority to do so. Should the Commission nonetheless issue such rules over Ameritech's objection, Ameritech respectfully requests that the Commission adopt the performance plan proposed in Ameritech's Comments.

Respectfully submitted,

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Dated: July 6, 1998

CERTIFICATE OF SERVICE

I, Demctrios G. Metropoulos, do hereby certify that a copy of the foregoing Ameritech's Reply Comments in Response to Notice of Proposed Rulemaking has been served on the parties of record, via first-class mail, postage prepaid, on this 6th day of July 1998.

By: Demetrios Metropoulos
Demetrios G. Metropoulos

AMERITECH'S REPLY COMMENTS: ATTACHMENT 1

Comparison of Proposed Measures

KEY:	
	"X" = Conceptually **agrees** to the NPRM-proposed measure, with variations possible in inclusions, exclusions, disaggregation
	"M" = Conceptually agrees to the NPRM-proposed measure, but only if the definition and/or calculation are **modified**
	"O" = **Opposes** the NPRM-proposed measure and does not propose any measure in this area
	"A" = Opposes the NPRM-proposed measure and, instead, proposes an **alternate** measure
	"n/a" = Does not specifically address the measure

NPRM # & Proposed Measure	Ameri-tech	SBC	Bell Atlantic	Bell South	COMMENTS [Note: As applicable, notes key consistencies and/or variations in: (1) overall measures & calculations; (2) exclusions/ inclusions; (3) disaggregation]
I. PRE-ORDERING					
I 1. Average Response Time	X	X	X	X	All generally agree to the measure described in the NPRM. Minor variations exist in proposed disaggregation (i.e., the names, grouping, and on-line functionality of pre-ordering functions.) Ameritech proposes an explicit exclusion of "valid returns" (i.e., an accurate system response to a query stating that "data is unavailable") from requested query counts. Variations in proposed disaggregation are related to variations in current system capability and reporting structure. For Wholesale, Ameritech reports on average response time (accepts vs. rejects) and percent rejects for all real-time functions (Customer Service Record, Address Validation, Telephone Number Selection, Due Date Selection). For Retail, Ameritech uses emulation and reports on real-time functions only. Ameritech non-real time functions (Feature Availability and Service Availability) are measured based on timeliness of distribution and reported for Wholesale only. SBC does not report non-real time functions (i.e., Facility Availability and non-electronic rejects). BA groups data into two functions: Customer Service Record and Other Pre-Ordering Functions (reporting both in CLEC and Retail aggregate). BST does not include Rejected Queries, Due Date Reservation, or Facility Availability, and reports all other Wholesale and Retail functions in aggregate.
II. ORDERING/PROVISIONING					
IIA. Order Completion Measurements					
II A 1. Average Completion Interval	M	M	M	M	The proposed measures are generally consistent with the NPRM-proposed measure, with some variation. Ameritech, SBC, and BA measure time through order completion (not completion notification) to ensure parity of CLEC and Retail measures and because completion notification is assessed by a separate measure. In addition, Ameritech and BST measures are based on date only (not time), as most ordering/provisioning systems do not currently track hours and minutes and tracking this information would require an entire redesign of these systems. Ameritech and SBC propose the explicit inclusion of "valid orders, only." Ameritech and SBC exclude customer-requested later due dates and Ameritech additionally excludes delays due to "customer not-ready" and "no access to the premise," as these are all factors beyond the ILEC's control. Ameritech does not exclude CLEC-supplemented orders, stating that these cannot be identified in the system. BA states that for all Ordering measures all orders that are confirmed or rejected are included [no further comment is provided]. Proposed disaggregation varies, primarily based on current system and reporting capability. Ameritech, SBC, and BST disaggregate by Resale Residence, Business, and Specials. Ameritech also includes Resale Centrex. Ameritech and SBC disaggregate UNE by unbundled loop [SBC further reports loops by 2-wire analog, BRI, & PRI], switching, and transport [-- labeled "dedicated transport" for SBC]. BST reports UNEs by loops w/ number portability and UNE designed & non-designed, since this is how their baseline of data currently exists. BA disaggregates both Resale and UNE by POTS and Specials; however, because BA uses product-specific "set" are the same for business and residence, BA does not include Residence/Business disaggregation levels. SBC, BA, and BST disaggregate by dispatch vs. non-dispatch. Ameritech, instead of "dispatch"/ "non-dispatch," reports "field visit" vs. "non-field visit," because, within Ameritech's systems, the "dispatch" indicator can apply to both field and central office dispatches. SBC, BA, and BST measure interconnection trunks as a separate category, stating that these processes involve unique activities. Ameritech does not report on interconnection trunks for this measure, since the interval for new networks is jointly negotiated and the interval for established networks is addressed in the "call completion" measure [proposed under "Interconnection Measures"]. None propose disaggregation by Combo of UNEs, since this category was not required by the 1996 Act. Similarly none include both "with INP" and "without INP" categories, since certain systems do not currently distinguish between the variables and, given that the category is "interim," a costly redesign of current processes and reporting would not be justified.
II A 2. Percentage of Due Dates Missed	M	M	M	M	The measures are generally consistent and in agreement with the NPRM, except that Ameritech measures time through order completion (not completion notification) and Ameritech, SBC, and BST calculations are based on date only (not time) as explained in "Average Completion Interval." For the same reasons noted in "Average Completion Interval", Ameritech, SBC, and BA exclude customer-caused misses; Ameritech excludes delays due to customer not-ready or no access to the premise; and Ameritech does not exclude CLEC-supplemented orders. BA states that for all Ordering measures all orders that are confirmed or rejected are included [no further comment is provided]. Disaggregation is the same as that described in "Average Completion Interval," except that Ameritech includes reporting on interconnection trunks, as here the category is appropriate.
IIB. Coordinated Customer Conversions					

Comparison of Proposed Measures

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	"X" = *Conceptually* ***agrees*** *to the NPRM-proposed measure, with variations possible in inclusions, exclusions, disaggregation*
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	"O" = ***Opposes*** *the NPRM-proposed measure and does not propose any measure in this area*
	"A" = Opposes the NPRM-proposed measure and, instead, proposes an **alternate** measure
	"n/a" = *Does not specifically address the measure*

NPRM # & Proposed Measure	Ameri-tech	SBC	Bell Atlantic	Bell South	COMMENTS [Note: As applicable, notes key consistencies and/or variations in: (1) overall measures & calculations; (2) exclusions/ inclusions; (3) disaggregation]
II B 1. Average Coordinated Customer Conversion Interval	O	O	O	O	All are opposed to this measure. Because current processes are non-mechanized, the NPRM-proposed measure would be labor intensive, imprecise, involving third-party vendors, and affected by uncontrollable external factors, such as a busy circuits. BA opposes the measure for similar reasons, but does describe a labor-intensive and manual measure of "Ported Number Orders Completed in > 1 Hour." BA adds that, "with the availability of LNP...there would no longer be a need for any measurement of this type."
IIC. Order Status Measurements					
II C 1. Average Reject Notice Interval	X	X	X	n/a	Ameritech, SBC, and BA generally agree with the measure described in the NPRM, although Ameritech emphasizes that the measure applies to electronically received orders, only (as this is how access is provided on the retail side). BST does not specifically address the measure. BA states that for all Ordering measures all orders that are confirmed or rejected are included [no further comment is provided]. Comments on disaggregation are similar to those included under "Average Completion Interval," with some variations. BA does not report on dispatch/non-dispatch, just as Ameritech does not include field/non-field visit, as these categories are not related to the speed of a rejection notice issuance (i.e., the decision on dispatch/field visit is made only after an order is accepted). Instead, BA disaggregates Resale & UNE (both per POTS & Specials) by Mechanized vs. Non-Mechanized (by both < & Orders. BA explains that order size and "flow-through" potential are significant to order processing time and line size determines whether a manual check for facilities is needed. Ameritech does not report on Unbundled Transport or Interconnection Trunks, as these orders are negotiated with competing carriers and, as such, never rejected. Ameritech, BA, and BST note that the measurement does not apply to Retail: the ILEC does not provide itself with rejection notices in the course of its normal retail operations, since this form is unique to the electronic interface through which the ILEC provides CLEC-access to ordering functions. Furthermore, imposing a Retail measure in this area would be non-sensical, as it would require the ILEC to "pretend" to perform a currently non-existent status assessment on itself and result in an arbitrary and speculative measure. Consequently, BA and BST do not propose a Retail equivalent; Ameritech proposes a Retail measurement on win-back orders only, as the electronic interface used for submitting win-back orders is the same as that used by CLECs for wholesale orders and the use of a win-back analog is sufficient to detect instances of discriminatory treatment.
II C 2. Average FOC Notice Interval	X	X	X	n/a	Ameritech, SBC, and BA generally agree with the measure described in the NPRM, although Ameritech emphasizes that the measure applies to electronically received orders, only (as this is how access is provided on the retail side). BST does not specifically address the measure. Comments on disaggregation are similar to those included under "Average Reject Notice Interval," except that Ameritech does apply the measure to Interconnection Trunks, as here it is appropriate. Ameritech, BA, and BST note that the measurement does not apply to Retail (again, as explained in "Average Reject Notice Interval"). Consequently, BA and BST do not propose a Retail equivalent; Ameritech proposes a Retail measurement on win-back orders.
II C 3. Average Jeopardy Notice Interval	O	O	O	O	*All are opposed to the NPRM-proposed measure, for numerous reasons. Jeopardy notices are issued based on potential order fulfillment problems, and no standard* definition of whether and when to issue jeopardies can exist. The provision of jeopardy notices is a secondary measure that has meaning only if the primary order timeliness measures (i.e, "Average Completion Interval" and "Due Dates Missed") indicate concern that bears further investigation. Furthermore, jeopardies commonly result from workload situations such as storms which cannot, by their nature, be identified in advance. Finally, formalized jeopardy processes do not exist in Retail operations. BST additionally states that, if a manual measurement was required, the calculation should be based on date only (not time), as measurement of hours and minutes is unnecessary.
II C 4. Percentage of Orders Given Jeopardy Notices	O	O	O	O	All are opposed to the NPRM-proposed measure, for the same reasons as described in "Average Jeopardy Notice Interval."
II C 5. Average Completion Notice Interval	M	X	X	X	Ameritech, SBC, BA, and BST generally agree with the NPRM measure, although Ameritech and BST emphasize that the measure applies to electronically received orders, only. (As BST notes, although BST "does receive a substantial number of orders from CLECs that have chosen to use non-electronic means...BST has no *mechanized means to measure completion intervals on such orders. There is no reason to impose excessive measurement costs on BST due to the CLEC's choice of* ordering vehicle.") In addition, Ameritech calculates the measure using date only (not time), as most ordering/provisioning systems do not currently track hours and minutes and tracking this information would require an entire redesign of these systems.

Comparison of Proposed Measures

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NPRM # & Proposed Measure	Ameri-tech	SBC	Bell Atlantic	Bell South	COMMENTS [Note: As applicable, notes key consistencies and/or variations in: (1) overall measures & calculations; (2) exclusions/ inclusions; (3) disaggregation]
					Comments on disaggregation are similar to those included under "Average Reject Notice Interval." Ameritech does not include field/non-field visit as this distinction would be both unduly burdensome to implement and uninformative, considering dispatch does not affect the time required to generate a notice after an order has been completed. Similarly, Ameritech does not report on Unbundled Transport or Interconnection Trunks, as these orders are always coordinated completions (i.e., competing carriers are directly involved in activities leading to completion and acceptance). Ameritech, BA, and BST note that the measurement does not apply to Retail (as explained in "Average Reject Notice Interval"). Consequently, BA and BST do not propose a Retail equivalent; Ameritech proposes a Retail measurement on win-back orders.
IID. Held Order Measurement					
II D 1. Average Interval for Held Orders	A	A	A	X	BST propose a measure similar to that of the NPRM; Ameritech and SBC propose alternative measurements. SBC recommends that a measure in this area focus specifically on delay days due to a lack of facilities, stating that, because "facility problems are the most common cause of missed due dates... this measure would capture the most relevant data regarding delayed order completion, and it would also permit comparison to retail data." Ameritech opposes the NPRM measure because it reflects the length of held orders based on a single point in time and, as such, does not help the carrier to determine if the time of its pending orders is any period for similar ILEC orders. Ameritech proposes an alternate measure of the average interval for past due orders, which would address the number of days to complete orders not completed on their original due date and which would enable a carrier to compare its average past due order period to the average period of similar ILEC orders. BA proposes a measure of "Average Delay Days," which appears to be similar to Ameritech's proposed alternative calculation of delay days on past due orders. BA and BST emphasize that the measure should exclude orders held for CLEC- and customer-caused reasons. Comments on disaggregation are similar to those included under "Average Completion Interval," except that Ameritech does report on interconnection trunks, while SBC does not. SBC notes that, as facilities are reserved for interconnection trunks before a FOC return on the service request, measuring interconnection orders' hold for facilities would be unnecessary. BST does not disaggregate by dispatch vs. non-dispatch, stating that there is no apparent benefit relative to the additional expense that would be incurred from this level of disaggregation.
IIE. Installation Troubles Measurement					
II E 1. Percentage of Troubles in 30 days for New Orders	X	M	X	M	All proposed measures are generally consistent with that of the NPRM, with some variation in the proposed calculations. BST emphasizes that time should be measured from installation date (vs. order date), stating that this is how they "currently and properly" measure troubles. SBC proposes reporting troubles on a line-number basis, as this is how SBC currently records and processes trouble reports; BST, on the contrary, proposes "per order" measurement, stating that this "will yield sufficient information to detect discrimination without the additional costs and systems work necessary to...track on a per line or per element basis." BST and BA propose the exclusion of CLEC- and end-user- caused problems, for the previously-noted reasons. Ameritech's measure includes all new (N), change (C), and to (T) type orders, except C orders generated as a result of a repair visit. Comments on disaggregation are similar to those provided under "Average Completion Interval," with some variations. SBC does not disaggregate by dispatch/non-dispatch, just as Ameritech does not include field visit/non-field visit. For the Resale and UNE categories described in "Average Completion Interval," SBC reports each by Individual CLEC, CLECs in aggregate, and SBC Retail (business vs. residence for Resale POTS). Ameritech, on the other hand, includes an additional level of disaggregation by "Found Network Trouble" disposition code, including Regulated Wire and Equipment, Outside Plant, and Central Office. [SBC, BA, and BST, do not propose reporting on these codes.] While BST and BA include interconnection trunks, neither Ameritech nor SBC report on this category: SBC notes that "network failures impact many customers on the competing carrier's network, not just one specific customer"; Ameritech's proposed Interconnection measure of "call completion" encompasses these installation troubles on interconnection trunks.
IIF. Order Quality Measurements					
II F 1. Percentage of Order Flow Through	X	X	X	X	The proposed measures are generally similar to that described in the NPRM. As in previous measures, Ameritech emphasizes the inclusion of valid orders only, and both Ameritech and BST propose the explicit exclusion of non-electronically submitted orders (as this is the definition of "flow through"). Proposed disaggregation varies, primarily based on current system and reporting capability. SBC reports on individual CLEC and CLECs in aggregate, as well as CLEC-order entry vs. Service Center-order entry, stating that "this is practical, feasible, and useful...[and] further disaggregation would be burdensome and costly and

Comparison of Proposed Measures

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NPRM # & Proposed Measure	Ameri-tech	SBC	Bell Atlantic	Bell South	COMMENTS [Note: As applicable, notes key consistencies and/or variations in: (1) overall measures & calculations; (2) exclusions/ inclusions; (3) disaggregation]
					enhance the CLEC's understanding of SBC's systems-performance capability." Ameritech, BA, and BST disaggregation is similar to that of the NPRM, but some variations exist. Ameritech adds Resale Centrex to the list of categories, but does not include Unbundled Transport or Interconnection Trunks, as these are trunk side (not line-based) services, not designed for flow through. BA reports on Resale, UNE, and Interconnection Trunks. No proposed disaggregations include Combo of UNEs, since this category was not required by the 1996 Act. Ameritech and BA note that no direct Retail equivalent is available. Consequently, BA does not propose a Retail equivalent. Ameritech, proposes a Retail measurement using win-back orders, as the electronic interface used for submitting win-back orders is the same as that used by CLECs for wholesale orders and the use of a win-back analog is sufficient to detect instances of discriminatory treatment.
II F 2. Percentage of Rejected Orders	X	X	X	M	All propose measures that are generally consistent with that described in the NPRM. As in "% of Order Flow Through," Ameritech and BST emphasize that the measure is calculated on electronically received orders only. BST proposes a calculation of "*service requests* rejected" and "*service requests* submitted" (vs. "orders") to reflect that these measures deal with rejected requests for service (--in other words, valid orders are not rejected). Ameritech proposes the explicit exclusion of orders submitted non-electronically or by Access Service Request (i.e., orders for unbundled transport or interconnection trunks) [as described in "Percentage of Order Flow Through"]. Comments on disaggregation are consistent with those included under "Percentage of Order Flow Through." Ameritech and BA note that there is no Retail analog for the interface edits involved. Consequently, BA does not propose a Retail equivalent, and Ameritech proposes a Retail measurement using win-back orders.
II F 3. Average Submissions per Order	O	A	O	O	All oppose the NPRM-proposed measure because it measures CLEC order quality, as opposed to the quality of CLEC access and because it is redundant with "Percentage of Rejected Orders." SBC opposes the NPRM measure and offers an alternative. Ameritech notes that, if a measure is required, a more appropriate calculation would be to divide "Orders Accepted for Provisioning" by "Orders Accepted for Provisioning less Orders Resubmitted" (with version numbers used to track resubmitted orders), as this measure would not fluctuate based on whether or not rejected orders were resubmitted within the same reporting period. SBC proposes measuring the "Average Time to Return Mechanized Rejects," stating that, with "% Rejected Orders," the measurement would offer CLECs appropriate information to effectively process orders Ameritech emphasizes that, if the measure is required, non-electronically submitted orders should be explicitly excluded, as in all Order Quality measures. Comments on disaggregation are consistent with those included under "Percentage of Order Flow Through." Ameritech notes that a measure on UNEs would not include Unbundled Transport or Interconnection Trunks (as these orders are never rejected), and Ameritech's Retail measurement would be measured on win-back ord
IIG. 911 Database Update and Accuracy					
II G 1. Percentage of Accurate 911 and E911 Database Updates	O	A	O	O	Ameritech, BA, and BST oppose this measure for multiple reasons. 911 and E911 services are already intensely scrutinized and maintained at the local level. In addition, ILECs cannot control the quality and accuracy of 911 listing data received from CLECs. Particularly in the case of electronic orders, the measure addresses the update mistakes made by CLEC personnel, versus those made by the ILEC's own personnel in preparing updates for their customers. Finally, there is no practical, automated way to separately measure the timeliness or accuracy of resale vs. retail orders. SBC agrees that the appropriateness of the measure depends upon the existing 911 database process of individual ILECs; SBC's measurements are limited to E911 Database Accuracy and Timeliness of Database Updates. BST proposes that, if the measure is required, facilities-based CLECs should be excluded from the calculation, as these CLECs order and provision 911/E911 services directly from third-party vendors and, as such, should report separately on their own experience.
II G 2. Percentage of Missed Due Dates for 911 and E911 Database Updates OR	M	A	O	O	BA and BST are opposed to the measure, for many of the same reasons noted under "% Accurate 911 and E911 Database Updates." SBC agrees that the appropriateness of the measure depends upon the existing 911 database process of individual ILECs; SBC's measurements are limited to E911 Database Accuracy and Timeliness of Database Updates. Ameritech recommends modifications to the two measurements as described in the NPRM. Ameritech first proposes a measure of "% of Customer Record Update Files Not Processed by the Next Business Day - Received Electronically." As Ameritech's system maintenance and upgrades are performed on Saturdays and Sundays, the calculation is based on business days only. When calculating "Percentage of Missed Due Dates", any files received after 3 pm will be considered received as of the next business day.

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Average Time to Update 911 and E911 Databases					Ameritech's second modified measure, "Mean Time to Process Update Files - Received Electronically," measures "update files," instead of "updates" for administrative convenience and cost control reasons. (In a given month, for example, instead of calculating the measure on the period's 1 million updates, the measure could be calculated on the 600 files containing those updates.) To properly assess parity, Ameritech emphasizes the importance of limiting ILEC responsibility for uncontrollable factors, particularly since a CLEC may choose how often, on what day, and in what batch size to submit updates. As such, Ameritech proposes the exclusion of update requests with files that contain 25% or more errors. Also, files received on weekends and between 5pm through 8am experience longer processing intervals as a result of system maintanence/testing. Furthermore, Ameritech proposes that ILECs be permitted to submit an analysis to demonstrate discrepancies which were outside of their control. Ameritech proposes the additional of processing the ILEC's own electronically submitted files. Furthermore, CLECs are offered the same electronic capabilities that the ILEC uses. And, finally, Ameritech does not currently measure manually submitted updates (except where required by the Michigan PSC), and the implementation of such a measurement would be expensive and inefficient. Ameritech proposes that the Wholesale measure for "Average Time to Update" include facilities-based CLECs, including ones that use their own facilities and unbundled network elements. In addition, the Retail measure should include updates received for end-users of resellers and of the ILEC. (Ameritech cannot distinguish between resale vs. retail updates since the same processes and systems are used for both retail and resale requests, and this inability to differentiate is the ultimate protection against discrimination.)
III. REPAIR & MAINTENANCE					
III 1. Average Time to Restore	**M**	**X**	**M**	**X**	The proposed measures are generally consistent with that described in the NPRM, except that Ameritech and BA measure the interval through service restoral time, as opposed to through the time of CLEC notification, since notification is provided only for electronically submitted tickets (and most CLECs submit trouble reports through non-electronic means) and, more importantly, since, by including notification time, the formula does not correspond to the stated measurement objective of isolating the time required to repair service for CLEC customers vs. the time required for retail customers. Several non-ILEC-controllable factors are proposed as explicit exclusions, including Ameritech's exclusion of delays due to no access to the premise, Ameritech & SBC's exclusion of trouble involving interexchange carriers, Ameritech & BA's exclusion of customer-requested later appointments, SBC & BA's exclusion of reports attributed to customer-provided equipment, and BA's overall exclusion of non-ILEC caused troubles. Both SBC and Ameritech agree to disaggregate by disposition code. However, SBC recommends that, as ILECs' disposition code model is typically unique, having to apply the LCUG model would be unnecessarily burdensome. Ameritech uses disposition codes instead of dispatch vs. non-dispatch, as disposition codes are more logical and less costly distinctions in examining repair. Furthermore, in certain instances, the characterization of a trouble as dispatch/non-dispatch might be misleading. In the case of cable troubles, for example, only the first ticket reported on a cable damage is marked as requiring dispatch, even though there might be 300 cases of reported troubles on that particular cable damage. BST objects to reporting by disposition code, stating that these are not relevant to assessing discrimination, that current systems only provide code information for POTS-type services, and that CLECs have access to the raw data and can perform a root-cause analysis of this nature if they so choose. Ameritech does not report on interconnection trunks, as this would be redundant with the proposed Interconnection measurement of "call completion." BST does report on Interconnection Trunks, but provides this measure in aggregate, as this is how BST's systems currently measur
III 2. Frequency of Troubles in 30-Day Period	**M**	**X**	**X**	**X**	The measures are generally consistent with that described in the NPRM, except that Ameritech reports on "trouble tickets closed" versus "trouble reports received" to be consistent with current system design capabilities and to ensure that the rate of troubles for each *type* of product or service is compared against the same undefined denominator. Comments on inclusions/exclusions and disaggregation are consistent with the comments provided in "Average Time to Restore."
III 3. Frequency of Repeat Troubles in 30-Day Period	**M**	**X**	**X**	**X**	The measures are generally consistent with that included in the NPRM, except that Ameritech reports on "trouble tickets closed" versus "trouble reports received" for the reasons described in "Frequency of Troubles in a 30-Day Period." Comments on inclusions/exclusions and disaggregation are consistent with the comments provided in "Average Time to Restore."

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III 4. Percentage of Customer Troubles Resolved Within Estimated Time	X	A	A	X	Although Ameritech and BST propose measures similar to that of the NPRM, SBC and BA propose an alternative measure of "Missed Repair Appointments." For interconnection trunks, SBC and BST propose alternative measures of "Average Trunk Restoral Interval" / "Average Time to Restore," stating that these measures would detect deficiencies in trunk sizing. Comments on inclusions/exclusions and disaggregation are similar to those included under "Average Time to Restore." BST does not report on Interconnection Trunks, because such troubles are handled on a first-in/first-out basis and, as such, appointment dates are not assigned.
IV. BILLING					
IV 1. Average Time to Provide Usage Records	A	A	A	M	Ameritech, SBC, and BST oppose the measure as described in the NPRM, and all propose alternatives. Reasons for opposing the measure include the fact that the date/time of neither call record nor usage record transmission are available in current billing systems and, even with a costly system modification, the costs of tracking average speed of usage records would increase exponentially to an increase in the volume of records. BST does propose to measure the NPRM-proposed average time interval, yet specifies three modifications. First of all, BST notes that the measure should be reported at a date level (not time), as billing activities currently use a process and as the exact time of transmission is based on CLEC decision. BST additionally proposes that billing measures refer to invoice "distribution" instead of "transmission," as, in today's environment, most bills are "distributed." Finally, in order to ensure CLEC-Retail measurement parity, on both sides, BST proposes that time is measured from record "create date" until delivery (either to the CLEC or to Retail BST billing processes). Instead of the NPRM measure of an average interval, Ameritech, SBC, and BA propose calculating the percentage of on-time usage records. Ameritech measures records transmitted in 5 days; SBC calculates "within 10" and "within 30" days; and BA proposes separate calculations for records within 3, 4, 5, and 8 days. For the same reasons as BST, Ameritech calculates the measure based on days only (not time). BST proposes two levels of disaggregation: ILEC-recorded data vs. "Other Company-Recorded" data (as Other Company data is much slower to receive) and end-user usage data vs. access usage data (but not alternatively billed usage records, as these are part of the same data stream as End-User Usage). Ameritech, SBC, and BA do not disaggregate by record type, citing the current system inability to distinguish between Retail and Wholesale records and the lack of reasonable cost-benefit of redesigning systems to do so. BA notes that a Retail equivalent analog does not currently exist and consequently does not propose a Retail equivalent.
IV 2. Average Time to Deliver Invoices	A	M	A	M	SBC and BST propose measures similar to the NPRM's measurement of average time. For reasons noted in "Time to Provide Usage Records," BST and SBC base their calculations on date only (not time). Likewise, for previously noted reasons, BST proposes consistent CLEC and Retail measures from "create date" through delivery. For the same reasons described in "Time to Provide Usage Records (i.e., system/cost implications and the lack of a retail analog), Ameritech and BA oppose the NPRM-proposed measurement of average time and, instead, offer an alternate measure of a percentage of on-time invoices. Like BST and SBC, Ameritech's measure is based on date only (not time). Ameritech measures Resale in 12 days and UNE in 6 days; BA uses 10 days.
V. GENERAL					
V A. Systems Availability Measurement					
V A 1. Percentage of Time Interface is Available	X	M	M	X	The proposed measures are generally consistent with that of the NPRM, except that SBC and BA measure per *actual* availability/operationally, as opposed to *scheduled* availability, "as this is useful." Ameritech, BA, and BST do not disaggregate by OSS function, as availability is driven by the interface, not the function. For Wholesale, SBC measures 12 electronic interfaces per OSS function; for Retail, SBC proposes CLEC-Retail comparative measurement only on those interfaces that an ILEC uses for itself, providing a standard % availability on non-ILEC used interfaces. Ameritech, BA, and BST note that no true retail equivalent exists, as OSS interfaces are not available to Retail units. As such, Ameritech, BA and BST do not propose retail equivalents.
V B. Center Responsiveness					
V B 1. Average Time to Answer Competing Carrier Calls	X	X	O	X	BA is opposed to the NPRM measure, stating that call centers for CLECs handle only exceptions and "help" needs and, as such, are not analogous to retail center call handling. SBC, BA, and Ameritech propose measures similar to that of the NPRM. Ameritech emphasizes that only TC-handled requests are counted as "answered calls." Ameritech disaggregates Resale and UNE categories by Ordering calls vs. Repair calls.
V C. OS/DA					

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V C 1. Average Time to Answer	X	X	O	O	BA and BST oppose the measure, stating that switches cannot distinguish between CLEC and end-user calls and that the cost of software to perform the measure would result in no benefit. SBC and Ameritech conceptually agree to the NPRM proposed measure. Regarding disaggregation, neither SBC nor Ameritech propose to separate Wholesale and Resale, since ILECs who have not deployed the capability in their OS and DA switches to differentiate between CLEC and retail traffic should not be burdened with this costly expense: this inability to differentiate is the best protection against discrimination. Ameritech does propose separate reports on OS versus DA calls, as the two involve separate processes that can produce significantly different results.
VI INTERCONNECTION					
VI A. Trunk Blockage Measurements					
VI A 1. Percent Blockage on Interconnection Trunks	A	A	M	M	BA and BST agree to provide measures similar to that of the NPRM. Because reported blockage on a trunk group does not always indicate an unacceptable level of blockage, BA and BST's measures are based on the number of trunk groups with blockage exceeding a specified threshold. BA measures intralata traffic > 1% blockage and interlata traffic> 0.5%, while BST's final trunk blocking threshold is set at 2%. SBC and Ameritech propose alternatives to the NPRM measure. SBC measures the average percentage of trunk blockage (instead of percentage of trunk groups blocked), stating that an average is preferable since it would allow for a blockage on the CLEC interconnection final-trunk groups to that of ILEC final-trunk groups. Ameritech's alternate measure is of Call Completion Rates, dividing "Number of Call Attempts - Number of Blocked Calls + Number of Successful Reroutes" by "Total Number of Call Attempts." While trunk blockage reports do not track calls to their ultimate destination to assess completion of the actual volume of traffic involved, call completion rates track calls to their final disposition, reflect actual call volumes, and measure all traffic over any time intervals. SBC, BA, and BST do not propose measures on Call Completion, stating that the measure is redundant with that of interconnection trunk blockage and that their current systems cannot distinguish calls to ILEC customers from calls to other carriers' customers. BST currently reports on all final trunk groups, both ILEC and CLEC administered. Ameritech disaggregates by Interlata vs. Intralata traffic. BA reports on interconnection trunks for CLECs and common trunks for ILECs, stating that because common trunks carry ILEC, CLEC, and sometimes IXC traffic, it is not possible to report CLEC blockage separately on common trunks that also carry ILEC local traffic.
VI A 2. Percent Blockage on Common Trunks	A	A	M	M	BA and BST agree to provide measures similar to that of the NPRM. Because reported blockage on a trunk group does not always indicate an unacceptable level of blockage, BA and BST's measures are based on the number of trunk groups with blockage exceeding a specified threshold. BA measures intralata traffic > 1% blockage and interlata traffic > 0.5%, while BST measures trunk groups with blockage > 3%. Both SBC and Ameritech propose alternate measures. SBC is opposed to a measurement of common trunk group blockage, stating CLECs will experience the same level of blockage on common trunk groups as the ILEC. However, SBC does propose to measure the "% of Local Common Transport Trunk Groups > 2% Blockage" and the "Distribution of Trunk Groups > 2%." Ameritech proposes an alternate measure of Call Completion Rates [as described and for the reasons explained in "% Blockage on Interconnection Trunks"]. SBC, BA, and BST do not propose measures on Call Completion [for reasons noted in "Interconnection Trunks."] BA's current common trunk data report is applicable to CLECs. Ameritech disaggregates by Interlata vs. Intralata traffic. SBC does not disaggregate between Wholesale and Retail. BA reports on interconnection trunks for CLECs and common trunks for ILECs, stating that because common trunks carry ILEC, CLEC, and sometimes IXC traffic, it is not possible to report CLEC blockage separately on common trunks that also carry BA local traffic.
VI B. Collocation Measurements					
VI B 1. Average Time to Respond to a Collocation Request	M	X	O	M	BA opposes the NPRM-proposed measure, stating that collocation arrangements vary tremendously in complexity and completion time based on CLEC desires and actions and that the NPRM proposes no exclusion for performance that is the CLEC's responsibility. Ameritech, SBC, and BST generally agree to the measure as described in the NPRM, although several clarifications and modifications are proposed to ensure that the measure addresses only those activities and factors which are within the ILEC's control. Both Ameritech and BST propose measuring date only (not time). Currently, collocation requests are typically processed over multiple and contractual requirements are expressed in days; as such, tracking hours and minutes would be unduly burdensome. Ameritech further clarifies that request "submission" should be measured as the date that the ILEC receives the request and "response" as the date that the ILEC sends out space availability and cost information to the CLEC. These definitions are appropriate, as the ILEC should not be responsible for knowing when the request was actually sent or when the response was actually received. BST proposes a general exclusion of delays due to factors outside of the ILEC's control, providing the example of building permits. Ameritech does not apply this measure to virtual collocation, as the provisioning of virtual collocation is based on the receipt of a firm order and the only response provided in a simple acknowledgement of receipt. Since this acknowledgement does not delay the provisioning of virtual collocation arrangements, measuring it here would provide little benefit to justify the costs.

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VI B 2. Average Time to Provide a Collocation Arrangement	**M**	**X**	**M**	**M**	Ameritech, SBC, BST, and BA generally agree to the measure as described in the NPRM. Ameritech and BST propose measuring date only (as explained in "Time to Respond to a Collocation Request"). Ameritech further clarifies that "submission" should be defined as the date the ILEC receives a "firm" order from the CLEC and that the "clock" should be re-started if the CLEC modifies its request, as the ILEC should not be responsible for knowing when the request was actually sent or the response was actually received. Furthermore, until a "firm" order is received, modifications in the CLEC's request commonly cause the ILEC to have to start over and/or re-perform work. Ameritech similarly proposes that "completion" should be defined as the date the ILEC sends notice to the CLEC that the space and collocation cage are ready, since that is the date that space is first actually available to the CLEC. The proposed exclusions are intended to limit factors over which the ILEC has no control. BST proposes a general exclusion of delays due to factors outside of the ILEC's control, such as building permits. Ameritech excludes CLEC-caused delays in arranging final walkthrough or accepting the space, as well as requests related to interconnection agreements with specified due dates. BA excludes CLEC requests beyond the standard interval and CLEC vendor delays. BA's proposed measure of the "Average Time to Provide Physical Collocation Cage" is reported on physical collocation only. BA notes that this is their single proposed Collocation measurement, as "this appropriately measures performance that is within [the ILEC's] control."
VI B 3. Percent of Due Dates Missed With Respect to the Provision of Collocation Arrangements	**M**	**X**	**O**	**M**	BA opposes the NPRM-proposed measure, for reasons noted in "Time to Respond to a Collocation Request." Ameritech, SBC, and BST generally agree to the NPRM measure, although several clarifications and modifications are proposed to ensure that the measure addresses only those activities and factors which are within the ILEC's control. Both Ameritech and BST propose measuring date only (not time), for reasons addressed in "Time to Respond to a Collocation Request." Similarly, Ameritech clarifies the definition of order "completion" and the instances where the "clock" must be re-started, again for the previously noted reasons.